



SDMS DocID

2205033

NUS CORPORATION

501

FMC, Baltimore m-02

+ DD# F3-8306-20

Terrence A. Shanno

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ORIGINAL
(Med)

Meeting: Fmc, Baltimore

Date : 6-20-83

Subject: Sampling Plan ~~Objectives for~~
6-21-83 Site Inspection

Attendees: Neil Swanson, EPA III

Peter Schawl, EPA III

Joseph Stang, DHMH - OBP 301-383-
6650

Elkins Dinkle, Jr., Baltimore City

Health : 396-4477

Charisse Deutch, Baltimore City

Health 396-4477

Terrace Shaeen, NWS Corp.

~~Neil Swanson~~ (TAS)

Don Senovich, NWS Corp.

301-355-6400 } Darryl Palmer, Fmc, Env. m.sr.
} Frank Solccki, Fmc, Prod. m.sr.
} Inkipnis, Fmc, Process Laboratory m.sr.
} Chuck Shaeen, Fmc, Env. Eng.

Summary:

Plant Size: \approx 20 ac. N. of Patapsco, 30 ac S. of Patapsco

Plant Pop : 350 people

(TA) Facts:

- prod. started 1957 ^{ORIGINAL}
- old Bldg #52: used ^{Prod.} for the chemicals' prod. from \approx 1960 through 1970
- Estimated Prod. by Pilot Plant: Y: 150,000 lb./yr.,
 $\approx 6.5 - 7.0 \times 10^6$ lb./10 yrs. by the prod. facility

In a discussion regarding the basis for including the Fmc plant on the EPA list of sites to be investigated, Fmc personnel stated that testing done by WSDA (referred to in the EPA dioxin report) showed the unanticipated presence of non- 2,3,7,8-TCDD isomers in their product.

Mr. Schonlau stated that the sampling anticipated by EPA III would be restricted to a screening program designed to confirm 2,3,7,8-TCDD presence or lack thereof.

In a discussion regarding split samples, it was decided by Mr. L Swanson and Peter Schul that, a sufficient sample was left over after homogenization, FIT III would provide the remainder to Fmc for d:ox: analysis.

Fmc stated they would provide their own glassware for the d:ox: samples.

In addition, it was decided to provide split samples of our priority pollutant samples to Fmc.

Fmc stated they would provide their own glassware for the priority pollutant samples.

Bldg #91: was the pilot plant.

Bldgs #52: " " prod. facility.

Both buildings have been re-configured, with asphalt covering in the general area

at each plant.

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Transport of the permethrin ^{original} was probably by drum and not by tankcar.

An old waste pond was covered by a CERCLA 102 response, which was associated with the production of the permethrin.

Bldg #91 was reconfigured for the production of Permethrin as a zero-discharge facility

Permethrin is used on cotton and tobacco.

The City of Baltimore has visited the plant periodically in response to complaints about odors, etc. However, no chemical-specific studies were performed by the Dept., to the best knowledge of Mr. Oehle, Jr.

The old waste pond is located to the south of the Patapsco River. It received aqueous wastes ^{ORIGINAL} from the production of the permethrin. The pond was excavated and filled, then a facility was constructed over the top. The pond's contents were removed and, according to Mr. Griffin, he heard by word-of-mouth that they were disposed of at Solley Rd. Landfill.

Both FMC and the State of Md. agreed to allow us to store our drums at waste on-site until it is determined how best to deal with the issue.

FMC requested compliance with company safety procedures, which was readily agreed to by EPA and MUS personnel.

An on-site incinerator, constructed in 1968, to the best of FMC personnel's

[knowledge, was not used for the
incineration of permethrin wastes.]

7

Fire will take the pictures using
their AE-1, develop the film, and
mail us the pictures.

^{ORIGINAL}
^(Red)

A copy of the attendees at the
meeting was obtained.

It was agreed that the site
investigation could commence at 0900
AM on 6/21/83.

Following the general discussion, a walk-
through of the facility was conducted.

The southeast section of the plant was
originally inspected, including the
retention basin, the fire water basin,
the old waste pond area (near the T-0H
control room, Bldg # 86), and a CERCLA-
reported inactive fill area. Both the old
waste pond area and the CERCLA
fill area were covered with what

appeared to be a white, 2-3" size, gravel, with an underlying ~~area~~ of fine sand, which presumably was ~~original~~ deposited by the old waste areas. There were no signs of environmental contamination in these areas.

The inspection team proceeded to the unnamed stream which bordered the eastern portion of the south part of the facility. Recent heavy rains had severely flooded this area. It was learned from Mr. Kignis that the entire area, including the old waste pond and the CERCLA till area, had at one time been a wetland area that had been filled in with miscellaneous, unknown materials.

Access to the eastern portion of the facility was via the East Gate, which was used at one time by all contractors entering the plant.

The inspection team proceeded to the former location of Bldgs. # 52, used for production of the ^{potential (TA)} dioxin-contaminated ^(RPA) product. The area is currently occupied by a RCRA waste storage facility and is completely covered by asphalt and gravel of the type mentioned earlier. An area of sediment accumulation was observed underneath steps on the northwest side of the area. An open drain was observed in a shallow depression area on the southwest side of the area. A railroad spur, running north/south, was located on the other side of a plant access road located immediately adjacent to the area's eastern side. Bldg. # 34 was located to the west of the area.

The team proceeded to the warehouse area adjacent to the plant's 2nd St. A RR spur, imbedded in a concrete canopy, was located parallel to 2nd St. next to the warehouse. The loading platform for the warehouse area was observed at the western end of the buildings. The RR bed material could not be ascertained.

The team proceeded to Bldg. # 91, located on the north side of Patapsco Ave. The facility, formerly the ^{original} plant for the product, is currently used for Ponce (permethrin) production. The equipment used in both Bldgs. # 91 and 52 were either decontaminated and reused elsewhere in the plant or sold as scrap. The Ponce treatment plant, located in the rear of the bldg., is a zero-discharge system, with a specified limit of 3 ppb of Ponce in the discharge. An area of soil was observed behind the building, amidst the production plant; waste treatment area. An area of grass-covered soil, containing scrub growth and small trees, was located in the buildings southeast corner. An asphalt parking lot/driving area bordered the building. The area occupied by the building is bordered on three sides (north-east-west) by three different companies. The interior of the building contained Ponce-related equipment, with the piping displaying fairly recent

painting.

ORIGINAL
^(med)

The team proceeded to the CERCLA - fill area, located south of Bldg #91 and north of Patapsco Ave. The area consisted of old, grown over foundations of former acetic acid production facilities. The area was very overgrown and contained a lot of standing water, due to the previous heavy rainfall of 6/19/83. One specific area was pointed out by Mr. Palmer as one area that FMC knew contained unknown, miscellaneous materials. As far as the rest of the area Mr. Palmer had no information.

A third CERCLA area was pointed out by Mr. Palmer, located ^{northwest} ~~east northwest~~ (1A) of Bldg #91's parking lot. The area was reportedly the former location of a tank of unknown origin and contents.

Following the completion of the inspection, personnel returned to the Conference Room for development / discussion of the sampling plan.

FIT III personnel advanced the following sites as possible sample locations:

- (1) Retention Basin Sediment Trap
- (2) CERCLA Area #1: 3 samples, augers, brackets
- (3) Old Waste Pond Area ^{HIGH/HAZ}
- (4) Stream sediment (Red)
- (5) East Gate
- (6) Bldg #52 (2 samples, one at the soil under steps, one near the drain)
- (7) RR spur near Bldg #52
- (8) Main RR Spur near warehouse area (mid-spur and near loading dock)
- (9) CERCLA Area #2: 3 augers
- (10) CERCLA Area #3: 1 sample
- (11) Bldgs # 91: 2 samples (soil in back of bldgs, grass/scrub area in front)

FMC personnel responded that the retention basin sediment trap currently contained about 8' of H₂O, and did not receive runoff from the areas of concern. The general plant collection system drained the remainder of the plant, but discharged to the collection system for the local Poth and did not offer any location.

from which to obtain ~~a~~ ^(TAD) solid sample. 13

Also, plant safety procedures would have to be checked, it an attempt ^{OPA/Med} were made to obtain a sample from the retention basin sediment trap. It was jointly decided not to sample the trap sediment.

All other sample stations were agreed upon. It was agreed that a person from FMC would accompany our sampling personnel and obtain a copy of the field splits for priority pollutant analysis. It was further agreed that blended, homogenized material would be provided FMC; if enough was left over after the EPA sample was obtained.

FIT personnel agreed to abide by FMC safety protocols requiring hard hats, goggles, and restricted smoking.

FIT, state, and city officials agreed to meet on-site at 9:00 on 6/21/83. Copies of a plant maintenance area schematic ^(THI) and a list of attendees, ^{and a secrecy agreement} ^(TAD) was obtained.

Location : FMC, Baltimore

Date : 6-21-83

Objective : Sampling - site ^{original} inspection

0900

Arrive on-site. Meet with D. Palmer of FMC. All NUS personnel are instructed in FMC safety procedures.

Lines of communication, investigation protocols, and sample locations are discussed. Personnel proceed to Facility, North Side, to initiate inspection.

0930

Arrive at Bldg. # 89, CP is established. Decon lines set-up.

Sample processing station established. T. Shannon and E. Dennis proceed down range with FMC personnel to mark and stake sample locations.

1000

After staking six sample locations, T. Shannon and E. Dennis return to CP.

1030

Downrange Team departs for sample station M-02-01. FMC personnel

accompany team downrange. As previously arranged, FMC personnel provide their own glassware, in ^{original} ~~used~~ homogenized (via stirring in steel bucket) split samples are placed for priority pollutant analysis. Sufficient sample volume is placed onto blender top, so that an equal, homogenized (via blender) split sample is provided FMC for dictation analysis.

1055

Downrange team returns uprange. Samples are split, homogenized, and decontaminated according to previously arranged protocols. Upon decon, samples are decontaminated and packaged according to previously arranged protocols.

1100

Downrange team departs to obtain sample from station # m-02-02.

1125

Downrange team returns to CP with sample for station # m-02-02. Sample processed as sample m-02-01.

1130

16

Sample team returns downrange to
obtain sample from station # m-02-03.

1150

Sample team returns to CP with
sample from station # m-02-03. Sample
processed as outlined for sample #
m-02-01.

1200

Sample team returns downrange to
obtain sample from station #
m-02-04.

1225

Sample team returns uprange from
station # m-02-04. Sample processed
as outlined for sample # m-02-01

1235

Sample team returns downrange to
obtain sample from station # m-02-05.

1250

Sample team returns to CP with
samples from station # m-02-05. A
duplicate sample was obtained from
this station for QC purposes. The duplicate
sample is processed under its own chain-of-

Sample LogORIGINAL
(Ready)

<u>Station #</u>	<u>Tag #</u>	<u>TR #</u>	<u>Time</u>	<u>Samplers</u>
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m-02-01	3-15550	N/A	1040	mn, OH
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m-02-01	3-15583	C-3705	1050	" "
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m-02-01	3-16015	mc-1208	1050	" "
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m-02-02	3-15718	N/A	1111	" "
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m-02-02	3-15719	C-3706	1120	" "
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m-02-02	3-15720	mc-1209	1120	" "
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m-02-03	3-14593	N/A	1135	" "
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m-02-03	3-14594	C-3736	1145	" "
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m-02-03	3-14595	mc-1210	1145	" "
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3-14599

m-02-04	3-14596 (TPB)	N/A	1208	" "
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m-02-04	3-14597	C-3737	1212	" "
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m-02-04	3-14598	mc-1211	1212	" "
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m-02-05	3-12084	N/A	1227	" "
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m-02-05	3-12085	N/A	1237	" "
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m-02-05	3-12086	C-3738	1244	" "
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m-02-05	3-12087	mc-1212	1244	" "
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Sample Log

ORIGINAL

(Rep)

<u>Station #</u>	<u>Tag #</u>	<u>TR #</u>	<u>Time</u>	<u>Sampler</u>
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m-02-06	3-12088	N/A	1305	MN. DH
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m-02-06	3-12089	C-3739	1309	" "
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m-02-06	3-12090	MC-1213	1309	" "
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m-02-07	3-12091	N/A	1326	" "
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m-02-07	3-12092	C-3740	1329	" cr
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m-02-07	3-12093	MC-0939	1329	" -
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m-02-08	3-12094	N/A	1340	Rsch Cromer
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m-02-09	3-12095	N/A	1523	MN, DH
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m-02-09	3-12096	C-3741	1536	" "
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m-02-09	3-12097	MC-0982	1536	" "
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m-02-10	3-12098	N/A	1549	" "
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m-02-10	3-12099	C-3742	1555	" "
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m-02-10	3-12100	MC-0984	1555	" -
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m-02-11	3-24051	N/A	} Station m-02-11	
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m-02-11	3-24502	C-3743	} unsampled. These	
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m-02-11	3-24503	MC-1001	} TAG and TRP's	
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transferred to

station # m-02-12.
Tag #'s voided.

Sample Log

<u>Station #</u>	<u>Tag #</u>	<u>TR #</u>	<u>Time (min)</u>	<u>ORIGINAL sampler</u>
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m-02-12	3-24054	N/A	1630	mr, DH
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m-02-12	3-24055	C-3743	1635	" "
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m-02-12	3-24056	mc-1001	1635	" "
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m-02-13	3-24057	N/A	1648	mr, DH
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m-02-13	3-24058	C-3744	1651	" "
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m-02-13	3-24059	mc-1002	1651	" "
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m-02-14	3-24060	N/A	1712	mr, DH
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m-02-14	3-24061	N/A	1712	" "
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m-02-14	3-24062	C-3745	1715	" "
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m-02-14	3-24063	mc-1003	1715	" "
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Note: m-02-14, Tag # 3-24061, is
to be split by laboratory.

m-01-01	3-24064	N/A	1055 (6/21/53)	Jeff Cox
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Note: m-01-01 was transferred, under
chain-of-custody, to Terrence
B. H. Wentworth
Shannon from Thomas Frazee (TAG)

This sample will act as the
QC duplicate from another
site.

Sample Log

20

<u>Station #</u>	<u>Tag #</u>	<u>TR #</u>	<u>Time</u>	<u>Sampler</u>
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Notes :

1. The following documents were worded during the site inspection:

- a. Chain-of-custody # 3-10880

- b. Inorganic Traffic Report # MC-0483

- c. Sample tag #'s 3-14596, 3-12085,
3-24051, 3-24052, & 3-24053.

2. The homogenization of all samples

obtained from site for diatom

analysis ~~was~~ was done in accordance
^(TA)

with Document # C-585-6-3-54
of Task # F3-8306-20.

3. Sample # m-02-05 (Tag # 3-12085)

was transferred to T. Frame at
NUS FIT III, according to QA/PC
protocols.

Sample Log

<u>Station #</u>	<u>Tag #</u>	<u>TR #</u>	<u>Time</u>	<u>ORIGINATOR</u> <u>(Ref)</u>
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22

custody. Samples processed as outlined
for sample station m-02-0 PR^{ORIGINAL}
(Red)

1300

Team returns downrange to obtain
samples from station #'s m-02-06
and m-02-07.

1315

Team returns uprange with sample
from station # m-02-06. Sample
processed as outlined for station
m-02-01

1320

Team returns downrange to obtain
sample from station # m-02-07

1335

Team returns uprange with sample from
station # m-02-07. Sample processed as
outlined for station m-02-01.

1340

A sample of decontamination rinse is
obtained by Rich Cramer. The sample
was from 1,1,1-trichloroethane rinsate
used to clean the blender top used
for the sampling at station # m-02-06.
Sample station was designated as # m-02-08.

1345

23

Team breaks down CP, in anticipation
of moving to South side of ~~initial~~ facility.

1415

Team proceeds to South side of facility,
after containerizing all solid and
aqueous wastes.

1430

Team breaks for snacks and smokers.

In a conversation with Neil Swanson,
it is decided, due to the time
constraints, to shorten the sampling
plan. Irv Kipnis relayed to us the
fact that, in a conversation with an
individual who remembers the old
Wldg #52 production, all of the
product was drummed and strapped by
truck.

Accordingly, it was jointly decided
with Neil Swanson that the railroad
spur samples were unnecessary. In
addition, samples were deleted from
the streambed and from the inactive

West area near the retention basin
 (two augers deleted)

ORIGINAL
 (red)

^(TAS)
 +300 1500

Team proceeds to CP location #2,
 and sets up CP. Eugene Dennis and
 T-Shannon proceed downrange and
 stake sample locations.

^(TAS)
 +320 1520

Team proceeds downrange to obtain
 sample from station # m-02-09.

^(TAS)
 +340 1540

Team returns uprange with samples
 from station # m-02-09. Sample
 processed as outlined for sample
 station # m-02-01.

^(TAS)
 +355 1545

Team returns downrange to obtain
 sample from station # m-02-10

1600

Team returns uprange with sample
 from station # m-02-10. Sample
 processed as outlined for sample
 station # m-02-01

1605

Team returns downrange to obtain
sample from station # m-02-11.

1615

Team returns uprange from station
m-02-11. Station was unsampleable.
Previously filled task #'s 3-24051, 24052
and 24053 are voided. TR # (-374)
is transferred to station # m-02-12,
as is TR # inc - 1001.

1625

Team returns downrange to obtain
sample from station # m-02-12.

1640

Team returns uprange with sample
from station # m-02-12. Sample
processed as outlined for sample at station
m-02-01.

1645

Team returns downrange to obtain
sample from station # m-02-13

1655

Team returns uprange with sample
from station # m-02-13. Sample
processed same as station # m-02-01.

1705

26

Team returns downrange to station # m-02-14. A duplicate sample is obtained from this station for QC purposes. One sample will be a feed blank. The other sample (duplicate) will be labeled "To Be Spiked By Laboratory."

1735

Team returns uprange with samples from station # m-02-14. A duplicate sample is also obtained. Samples processed same as station # m-02-01.

1745

Chain-of-custody transferred to FMC obtained for sample splits provided FMC, Receipt (TAS)

1750

Team begins breakdown at CP.

1815

Team departs site. !

6/29/83 11:14 2 performance audit samples 27

added to shipment ; labelled MO 2-15, M-02-16.

PA spls. recvd. from EMSL-LV 6/29/83, originally from
Region III. R. Shad

ORIGINAL
(Red)